



0000008524

BEFORE THE ARIZONA CORPORATION COMMISSION

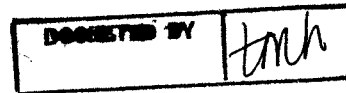
JIM IRVIN
 COMMISSIONER-CHAIRMAN
 RENZ D. JENNINGS
 COMMISSIONER
 CARL J. KUNASEK
 COMMISSIONER

Arizona Corporation Commission

DOCKETED

JUL 08 1998

RECEIVED
 AZ CORP COM
 JUL 08 3 55 PM '98



IN THE MATTER OF U S WEST) DOCKET NO T-00000B-97-0238
 COMMUNICATIONS, INC.'S COMPLIANCE) U S WEST'S RESPONSE TO
 WITH §271 OF THE TELECOMMUNICATIONS) ARIZONA CORPORATION
 ACT OF 1996) COMMISSION STAFF'S
) FIRST SET OF DATA
) REQUESTS

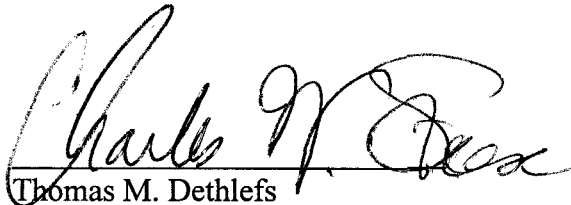
Pursuant to Section 14-3-101 of the Arizona Administrative Code, which incorporates the Arizona Rules of Civil Procedure, and the Commission's June 16, 1998 Order, U S WEST Communications, Inc. ("U S WEST") hereby responds to the Arizona Corporation Commission Staff's request for discovery and production of documents as follows.

GENERAL OBJECTIONS

1. U S WEST objects to each request insofar as it purports to require U S WEST to provide documents not within its possession or control on the grounds that the request is unreasonable, oppressive and unduly burdensome.
2. U S WEST objects to each request insofar as it calls for discovery or the production of documents concerning § 271 checklist items or categories of information which U S WEST has not yet submitted to the Arizona Corporation Commission for consideration on the grounds that such request is premature, unreasonable, oppressive and unduly burdensome.
3. U S WEST objects to each request to the extent it seeks the discovery of matters in excess of the limited discovery, relating to the checklist items filed by U S WEST with the Commission on April 13, 1998, authorized in the procedural order issued by the Arizona Corporation Commission on June 16, 1998.
4. U S WEST objects to each request insofar as it calls for the production of documents protected by the attorney-client privilege, the work product doctrine, or both.

5. U S WEST objects to each request to the extent that it requires U S WEST to disclose documents containing confidential and proprietary business information on the grounds that U S WEST should not be required to provide that information in the absence of a suitable protective order.

Dated July 7, 1998

A handwritten signature in cursive script, appearing to read "Charles W. Steese", written over a horizontal line.

Thomas M. Dethlefs

Charles W. Steese

U S WEST

1801 California Street, #5100

Denver, CO 80202

Attorneys for U S WEST

MJR-2 Are the CLEC's required to go through Single Point of Termination (SPOT) frames instead of U S WEST's own Main Distribution Frame (MDF) for access to unbundled loops, trunks or other elements? If so, why? Again if so, how do SPOT frames compare to MDF frames in terms of reliability?

U S WEST's Objection:

U S WEST objects to responding to any data request that concerns issues on which U S WEST has not yet filed. The June 16, 1998 Order in conjunction with the May 27, 1997 Order setting forth the partial filing format, limit discovery to the exact subject matters contained in U S WEST's partial filings. Moreover, in the June 16, 1998 hearing before Chief Hearing Officer Rudibaugh, a general agreement to limit discovery to the particular issues filed was reached. U S WEST plans to file its material on nondiscriminatory access to network elements as one collective category in the future. U S WEST will respond to this data request in accordance with the current Order or within ten days after U S WEST files that subject matter with the Arizona Corporation Commission.

MJR-3 Will U S WEST provide the same level of security for the CLEC's 911/E911 circuits as it does for its own 911/E911 circuits?

U S WEST's Objection:

This request is vague and ambiguous. U S WEST does not understand the meaning of "same level of security." Arguably, the information requested concerns issues on which U S WEST has not yet filed. U S WEST's response will therefore include its definition of "same level of security" and its response will be limited to this definition.

MJR-18 What evidence is there that U S WEST is handling numbering administration in a nondiscriminatory way?

U S WEST's Objection:

U S WEST objects to this request to the extent it requests specific performance measurement data, because U S WEST plans to file its material on performance measures as one collective category in the future. U S WEST will supplement its response to this data request in accordance with the current Order or within ten days after U S WEST files that subject matter with the Arizona Corporation Commission.

MJR-19 Does U S WEST provide direct interconnection of CLEC signaling to its switches? If so, please describe the technical specifications of the interconnection.

U S WEST's Objection:

U S WEST objects to this request to the extent it requests specific interconnection data, because U S WEST plans to file its material on interconnection as one collective category in the future. U S WEST will supplement its response to this data request in accordance with the current Order or within ten days after U S WEST files that subject matter with the Arizona Corporation Commission.

MJR-23 How does U S WEST give CLEC access to customized routing on U S WEST switches?

- a. Does dialing parity depend on the way U S WEST gives CLECs access to customized routing on U S WEST switches?

U S WEST's Objection:

U S WEST objects to this request to the extent it requests information concerning switching, transport, number portability or any other issue upon which U S WEST has not yet filed, because U S WEST plans to file its material on these individual issues in the future. U S WEST will supplement its response to this data request in accordance with the current Order or within ten days after U S WEST files that subject matter with the Arizona Corporation Commission.